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July 7, 2025

**VIA ECF**

Hon. Edgardo Ramos  
 U.S. District Court for the Southern District of New York  
 40 Foley Square  
 Courtroom 619  
 New York, NY 10007

**Re: *Brous v. Eligo Energy, LLC, 24 Civ. 1260*  
 Defendants' Response to Plaintiffs' Letter Motion for Extension of Time (Doc. 251)**

Dear Judge Ramos:

We write in response to Plaintiffs' July 3, 2025 letter motion for an extension of time. While Defendants do not believe the four-week extension Plaintiffs have requested is necessary, they do not oppose Plaintiffs' letter motion. Defendants offer this brief response only to show that Plaintiffs' letter motion was unnecessary and unwarranted and that Plaintiffs' accusations against Defendants' counsel are equally improper.

First and foremost, Defendants never refused Plaintiffs' request for an extension. Rather, they offered from the beginning to consent to an extension of at least two weeks. *See* ECF 251-2. Defendants asked for certain concessions from Plaintiffs in exchange for a longer extension, *id.*, but rather than negotiate, Plaintiffs ceased any further communications with Defendants' counsel on this issue and filed their letter motion. Plaintiffs took that "my way or the highway" approach just days after professing their supposed desire to lessen the burden their serial motion practice has imposed on the Court. *See* ECF 241.

Defendants were reluctant to agree to the month-long extension Plaintiffs requested because, as Plaintiffs have made clear, they intend to use the time to file additional motions to compel that Defendants regard as baseless and harassing. *Id.* Plaintiffs' overuse of such motions – already exceeding 15 in number – has been abusive and imposed wholly unnecessary costs on Defendants, in addition to (by Plaintiff's own admission) overburdening the Court and its staff. So, while Defendants do not oppose Plaintiffs' requested extension, the Court would be well within the bounds of its discretion to deny it if it saw fit to do so.

Respectfully,

*/s/ Ryan Watstein*  
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